

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN RE:	) Case No. 10-15099-RB
	) Chapter 11
KIEBLER RECREATION, LLC,	) The Honorable Randolph Baxter
d/b/a Peek'n Peak Resort,	)
	)
Debtor	) Related to Docket Nos. 705 and 706

**OBJECTION TO FINAL APPLICATIONS FOR ALLOWANCE OF COMPENSATION  
AND REIMBURSEMENT OF EXPENSES OF THOMPSON HINE, LLP, DEBTOR'S  
FORMER ATTORNEY, AND INGLEWOOD ASSOCIATES, LLC, DEBTOR'S  
FINANCIAL ADVISOR**

AND NOW, this 2<sup>nd</sup> day of August, 2011, comes C.A. Curtze Co., Inc. a/d/b/a Specialty Steak Service ("Curtze"), by and through its counsel, Knox McLaughlin Gornall & Sennett, P.C., 120 West Tenth Street, Erie, Pennsylvania 16501, Attention: Guy C. Fustine, with this Objection to the Second and Final Application for Allowance of Compensation and Reimbursement of Expenses for the period November 1, 2010 through June 20, 2011 on behalf of Thompson Hine, LLP, the former attorneys for the Debtor; and, the Second and Final Application for Allowance of Compensation and Reimbursement of Expenses for the period December 1, 2010 through June 24, 2011 on behalf of Inglewood Associates, LLC, the Financial Advisor for the Debtor, as follows:

1. By Order of the Honorable Randolph Baxter dated November 3, 2010, Curtze was granted an allowed administrative expense claim under 11 U.S.C. §503(b)(9) in the amount of \$29,833.22.

2. There are limited funds available for the payment of Chapter 11 administrative expense claims.

3. If the applications for compensation are allowed as filed, the funds available for distribution to creditors holding allowed Chapter 11 administrative expense claims, including Curtze, would be substantially diluted.

4. The requested fees are unreasonable in light of the services rendered and the results obtained. Given the amount of time involved, including consideration of the difficulty of the issues presented, the skill requisite to perform the services properly and the customary fees for similar services, the requested fees are unreasonable and excessive.

WHEREFORE, Curtze requests that the above-referenced applications for compensation and reimbursement of expenses be denied or, in the alternative, substantially reduced; and, that Curtze have such other and further relief as is reasonable and just.

Respectfully submitted,

KNOX McLAUGHLIN GORNALL &  
SENNETT, P.C.  
Attorneys for C.A. Curtze Co., Inc. a/d/b/a  
Specialty Steak Service

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Objection was served by first class, United States mail, postage pre-paid, on August 2, 2011, as set forth on the attached service list, in addition to the electronic service which was accomplished when the Objection was filed with the Court.

Respectfully submitted,

KNOX McLAUGHLIN GORNALL &  
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